

1 ANDREW S. ELLIOTT (State Bar No. 254757]
ase@severson.com

2 SEVERSON & WERSON
A Professional Corporation
3 595 Market Street, Suite 2600
San Francisco, California 94105
4 Telephone: (415] 398-3344
Facsimile: (415] 956-0439

5 Attorneys for Defendants 1850 BRYANT LAND
6 LLC, CHRISTOPHER PAUL FOLEY AND
DOUGLAS ROSS

7
8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

10
11 UNITED STATES OF AMERICA, *ex rel.*
LEIASA BECKHAM, and STATE OF
12 CALIFORNIA, *ex rel.* LEIASA BECKHAM,

13 Plaintiff,

14 vs.

15 1850 BRYANT LAND LLC, KASLOFSKY
& ASSOCIATES LLC, THURSTON
16 KASLOFSKY, CHRISTOPHER PAUL
FOLEY, DOUGLAS ROSS, SAN
17 FRANCISCO COMMUNITY INVESTMENT
FUND, CITY AND COUNTY OF SAN
18 FRANCISCO, and NAOMI KELLY,

19 Defendant.

Case No. 3:21-cv-05742-RS

Declaration of Sebastian Alioto

1 I, Sebastian Alioto, declare as follows:

2 1. I am the Chief Financial Officer at Mission Neighborhood Centers, Inc. ("MNC").

3 I have been the CFO since July 2018 and on the Board of MNC since 2007. I have personal
4 knowledge of the facts set forth below and, if called upon to do so, I could and would testify
5 competently about those facts.

6 2. On behalf of MNC, I was involved in the discussions with 1850 Bryant Land, LLC
7 to potentially partner in the development of a new construction community condominium project
8 located at 1850 Bryant Street, San Francisco, CA (the "1850 Bryant Project"), whereby MNC
9 would contribute capital in effort to purchase its own condominium unit.

10 3. While MNC and 1850 Bryant Land, LLC engaged in various discussions, MNC
11 ultimately decided not to move forward with the 1850 Bryant Project. MNC does not fault 1850
12 Bryant Land, LLC or its principals in connection with MNC's decision not to move forward with
13 the 1850 Bryant Project.

14 4. MNC has never obtained grant funds or any other public money in connection with
15 the 1850 Bryant Project. MNC did, however, receive grant funds around the same time it was
16 analyzing whether to participate in the 1850 Bryant Project. Those grant funds were transferred to
17 another project and were not used in connection with the 1850 Bryant Project.

18
19 I certify under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct. Executed at San Francisco, California, on October 18, 2022.

21 DocuSigned by:

22 *Sebastian Alioto*

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24 Sebastian Alioto